

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

DONNA SCOTT

Case No. C-1-02-075  
J. Weber

Plaintiff,

v.

THE UNION CENTRAL LIFE  
INSURANCE COMPANY**PLAINTIFF'S EXHIBIT LIST**

Defendant.

Pltf. No.	Deft. No.	Date Issued	Date Offered	Obj.	Adm.	Description of Exhibits
1.		WID	8/26			Section 8 of Defendant's Employee Manual Re: Grievance Procedure
2.		8/25	1		8/26	For The Record: Donna Scott dated 2/5/01
3.		8/25				Letter to Rick Pretty and Connie Retherford from Donna Scott dated 2/5/01
4.		8/25				Letter to Rick Pretty and Connie Retherford from Donna Scott dated 3/6/01
5.		8/24				Donna Scott Performance Evaluations
6.						Letters of Appreciation for Donna Scott while in the Human Resource Department
7.		8/25				Letter of Appreciation for Donna Scott dated 5/5/98
8.		8/25				Letter of Appreciation for Donna Scott dated 1/20/99
9.						Letter of Appreciation for Donna Scott dated 1/22/99
10.		8/25				Letter of Appreciation for Donna Scott dated 2/1/99
11.		8/25	▼		▼	Letter of Appreciation for Donna Scott dated 9/17/99

Pltf. No.	Deft. No.	Date Issued	Date Offered	Obj.	Adm.	Description of Exhibits
12.		8/24	8/26		8/26	E-mail to Becky Deppen from Anne Leung regarding Donna Scott dated 10/5/99
13.		8/25				Letter of Appreciation for Donna Scott dated 9/14/00
14.		8/25				Various e-mails between Connie Retherford and Donna Scott regarding position with Jim Ascheman
15.		8/24				Inter-Office Memo to Rick Pretty from Connie Retherford regarding Annuity Interviews dated 4/10/01
16.		8/24	▼		▼	Annuity Division Interview Summaries
17.		W/D				Connie Retherford's handwritten notes regarding Donna Scott
18.		W/D				Defendant's Responses to Request for Information from Ohio Department of Job and Family Services dated 4/18/01
19.		W/D				Letter to Ohio Department of Job and Family Services from Defendant dated 5/29/01
20.		8/24	8/26		8/26	Position Description for Annuity Client Service Representative IV and Key Annuity Contacts list
21.		8/25	▼		▼	E-mail to Donna Scott from Richard Pretty regarding Service Allotment Request dated 12/15/97
22.		W/D				Letter to EEOC from Defendant regarding response to letter of 9/18/01 dated 10/3/01 with attachments
23.		8/24	8/26		8/26	Salary Ranges for 1996-2002.
24.		8/25	↓		↓	Merit Increase Matrix for 1996-2002
25.		8/24	↓		↓	Monthly Reports of Salary for the Annuity Department for 1998-2002
26.		W/D				Application for Employment by Donna Scott
27.		8/25	8/26		8/26	Daniel Woodard personnel file excerpts

Pltf. No.	Deft. No.	Date Issued	Date Offered	Obj.	Adm.	Description of Exhibits
28.		8/24	8/24		8/26	Edwin Ericson personnel file excerpts
29.		8/25				Union Central Employee Manual
30.						Union Central Values
31.		8/24				Union Central Annual Reports 1999-2000
32.		8/24				Donna Scott W-2 forms 1998-2000
33.		8/24				Donna Scott benefit statements for 2000 and 2001
34.		8/25				[redacted] E-MAIL FROM C.LETTERFORD
35.		8/25	▼ REDACTED ▼			Dr. Wenker medical records for Plaintiff
36.		W/D				Dr. Scheidler medical records for Plaintiff

37 Plaintiff reserves the right to amend this list, introduce any of Defendant's exhibits, and introduce rebuttal exhibits as necessary.

Respectfully submitted,

/s/ George M. Reul, Jr.  
 Randolph H. Freking (0009158)  
 George M. Reul, Jr. (0069992)  
 Trial Attorneys for Plaintiff  
 FREKING & BETZ  
 215 East Ninth Street, Fifth Floor  
 Cincinnati, OH 45202  
 Phone: (513) 721-1975  
 Fax: (513) 651-2570  
 E-mails: randy@frekingandbetz.com  
 greul@frekingandbetz.com

#### CERTIFICATE OF SERVICE

I hereby certify that on August 11, 2004, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system and copies will be mailed via U.S. mail to those parties who are not served via the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ George M. Reul, Jr.